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Monsanto

E.6
11/10/80
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FROM

(NAME-LOCATION-PHONE)

R.H. Sinise, W. G. Krumrich Plant (2271)

DATE

November 10, 1980

SUBJECT

MEETING WITH I-EPA
"DEAD CREEK" 11/7/80

REFERENCE

TO

P.E. Heisler

S.G. Collins

A3ND

M.R. Foreman

G4WA

R.G. Kaley

T2F

J.V. Malloy (2 copies)

E2NE

J.J. Spano

G4NH

J.H. Craddock

B2SC

Present at Meeting:

P. Heisler, W GK
R. Sinise, W GK
R. Kaley, G.O.
Jim Kalty, I-EPA
Frank Schmidt, I-EPA (Champaign Lab)
Roy Frazier, I-EPA (Champaign Lab)
John Renkes, I-EPA
John Hairley, I-EPA (Springfield Lab)

Meeting started with introductions between the participants and the exchange of sampling results:

	<u>I-EPA</u>	<u>Monsanto</u>
1) North sample (Queen Avenue)	10,000 ppm PCB 2,000 ppm P (total) did not measure	13,000 ppm PCB 2,500 ppm P (total) 0 ppm P (elemental)
2) Center sample	350 ppm PCB 8900 ppm P (total) did not measure	240 ppm PCB 13,000 ppm P (total) 0 ppm P (elemental)
3) South Sample	73 ppm PCB 4700 ppm P (total) did not measure	45 ppm PCB 9400 ppm P (total) 0 ppm (elemental)
4) Well Sample	0 ppm PCB	<1 ppb PCB

There was agreement that the results were done within the limitations of the sampling and analyzing variables and well within the sample variations seen in the creek dirt. To avoid confusion, only the I-EPA results would be released to the public with a statement verifying that Monsanto results

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were in close agreement. We stressed the importance of releasing to the public the fact there was no elemental phosphorus present, that phosphorus has not caused the "spontaneous combustion" referenced in the media. The IEPA agreed to say Monsanto found no elemental phosphorus and that the IEPA may conduct additional analysis to verify this fact.

The lab people from Champaign verbally stated they had no indications of elemental phosphorus during their analysis and agree there probably was not any present.

We gave them a copy of our results and a copy of the method we use to analyze for elemental phosphorus. We discussed methods of releasing this information to the press and suggested the IEPA Public Relations representative work with our Sarah Collins. They appeared to agree but based on their recent style of unilateral release of information, we reinforced our request that no elemental phosphorus was found, and this be included in any release.

Renkes from IEPA picked up the meeting following some discussions concerning sample methods.

- Q. We have an obvious problem in Dead Creek with burning dirt. Has Monsanto formed an "opinion" as to the cause?

Our "opinion" is that people burn rubbish in the Creek area, the municipal employees burn brush, and a midnight hauler probably has been dumping lube oil etc. at the site. The combination of both causes ignition. In addition, there may be enough peat from decomposed leaves to support ignition for a period of time.

- Q. At the end where there is "spontaneous burning", we have found no organics. Residents have made statements that burning starts on hot days and glows at night.

We have first investigated the problem in June, 1980, when we received notice of burning ground. Upon investigation we saw white smoke indicating the potential of elemental phosphorus. We measured but did not find it. Further, the smoke did not smell like it came from phosphorus nor did the smoldering itself look like phosphorus. We do not understand fully how this combustion could sustain itself.

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Q. Do we have any opinion on where the PCB's came from.

We stated that we firmly believe we are not at fault in causing the PCB to be present in the ditch. The total phosphorus analyzed for us, in our opinion, is present from agricultural runoff. The PCB's and with the Trichlorobenzene's indicated to us someone has dumped transformer oils in the ditch. We have records on PCB disposal back several years and we have always disposed of PCB wastes in an environmentally acceptable manner. We historically have used Bills-of-Lading to ensure all wastes land-filled on non-Monsanto owned land. This practice was followed to control disposal.

Paul further stated that the sewer effluent of our plant since 1932 could not have gone into Dead Creek since the Creek is 1.9 feet higher than the sewer system. PCB was manufactured starting in 1936. We have landfilled the waste in our own land-fill or incinerated them in a high temperature incinerator. This unit was shut down and we have since put PCB's in long term storage.

Renkes then further pursued the "obvious implication of Monsanto due to proximity." We responded by stating that we are not responsible and we know of no way we could identify who manufactured the PCB's found in the ditch. He then asked on an informal basis:

"As a good neighbor would we (Monsanto) consider assisting our department in the mitigation of the Dead Creek problem. Mitigation meaning removing the soil to one of eight federal approved controlled sites at Monsanto's expense."

Paul responded by stating that we don't have the authority here to make that decision and will have to discuss with our supervision. As a stockholder, I would be against it, but I must discuss with the appropriate Monsanto management before formally responding.

We asked the extent of the soil removal Renkes had in mind. That is, all dirt with PCB greater than 1000 ppm or what. Kelty responded by stating that 50 ppm is the federal figure and that is as good as any. Kelty will, however, decide what the baseline figure is for removal versus staying in the creek and respond to us.

I asked the question that this request seemed premature to me. If phase two analysis (groundwater quality testing) indicates no health hazard, which we believe there is some, then why could not the ditch be capped over.

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Rankes responded by stating EPA regulations do not allow them to let contaminated soil remain in an unapproved landfill. Past precedent in the Chicago area has supported this interpretation of the regulation.

We asked if the Pollution Control Board could grant an exemption from the regulation in this case. Rankes responded by saying yes, but it is highly unlikely. Paul suggested they investigate this solution.

Rankes also questioned as to whether Monsanto had records concerning PCB disposal and whether the agency could review these records. We said we had records but didn't know how far back and would have to investigate with Monsanto Legal Department whether the agency could inspect them.

The meeting was closed by the IEPA stating they were trying to arrive at a solution prior to the Attorney General taking action. These questions and requests were informal and would not prevent the Attorney General from taking action even if we agreed to mitigation.


R.H. Sinise

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Documents given to I-EPA:

- 1) Dead Creek Analysis Report No. ES-80-SS-24
- 2) Methods ES-80-M-24
ES-80-S-27
ES-80-M-29
ES-80-M-30
ES-80-M-28

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